

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

HUAWEI TECHNOLOGIES CO. LTD.,

Plaintiff,

v.

VERIZON COMMUNICATIONS, INC., et al.

Defendants.

VERIZON BUSINESS NETWORK
SERVICES, INC., et al.

Counterclaim-Plaintiffs,

v.

HUAWEI TECHNOLOGIES CO. LTD.,
et al.

Counterclaim-Defendants.

No. 2:20-cv-030-JRG

Jury Trial Demanded

JOINT NOTICE OF AGREEMENTS ON PRETRIAL MATTERS

Pursuant to the Court's Docket Control Order (Dkt. 308), the Parties hereby file this Notice to inform the Court of agreements reached during meet and confers about outstanding objections and motions *in limine*.

Having conferred numerous times to try to resolve outstanding disputes, the parties have reached the following agreements:

1. The parties have agreed to preadmit many of the exhibits on the parties' exhibit lists, and are continuing to confer in order to further reduce the objections that need to be heard at the forthcoming Pretrial Conference. The parties will file amended exhibit lists reflecting any agreements as soon as possible, and will continue to crystallize the outstanding disputes.
2. With respect to deposition designations, both Parties agree that, because of the Parties' Stipulated Trial Management Procedures (Dkt. 403 at 27)—which provide a process for disclosure of deposition testimony and resolution of any objections during trial—the Parties should defer any objections over deposition testimony until the time set forth in those procedures. This will ensure the Court does not have to rule on a host of objections that will ultimately be moot, since both sides intend to significantly reduce the amount of deposition testimony actually played at trial (based on pretrial motions, case narrowing, available trial time, etc.) relative to what has been designated to date.
3. The parties have agreed to exclude *in limine* the following matters (which moot in part motions *in limine* currently pending before the Court, as indicated alongside each agreement below).¹ The parties will shortly file a supplemental Joint Notice of Agreed

¹ Verizon's agreements are all subject to Verizon's arguments in opposition to Huawei's MILs (Dkts. 402, 422). While Huawei does not understand the scope of this caveat, the parties will continue to confer to clarify the specific bounds of the agreements prior to supplementing the

Motions *in Limine* consolidating this list with Dkt. 361. The parties are continuing to meet and confer on the pending motions *in limine* and will apprise the court of any further agreements before the pretrial conference.

- a. Any reference, argument, evidence, or testimony relating to Xinjiang, Hong Kong, Taiwan or Tibet. (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 1.)
- b. Any reference, argument, evidence, or testimony suggesting that Huawei has retaliated against the United States. (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 2.)
- c. Any reference, argument, evidence, or testimony about the way a Party reviewed source code in this case (e.g., in person vs. printouts). (This agreement stems from Verizon's response to, and moots in part, Huawei's MIL No. 6.)

Dated: June 8, 2021

Respectfully submitted,

/s/ Jason D. Cassady

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/s/ Deepa Acharya

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LICENSING INC.**

CERTIFICATE OF SERVICE

The undersigned certifies that counsel of record is being served with a copy of the foregoing document via the Court's electronic filing system on this 8th day of June, 2021.

/s/ Jason D. Cassady
Jason D. Cassady